

NCPA A Public Agency

Northern California Power Agency

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MICHAEL W. McDONALD

General Manager
(916)781-4203

March 10, 1995

Mr. Tom Howard
Senior Water Resources Control Engineer
Bay/Delta Program
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

**SUBJECT: Comments on the Draft Bay/Delta Water Quality
Control Plan and Environmental Report**

Dear Mr. Howard:

The Northern California Power Agency (NCPA) is pleased to have this opportunity to provide written comments on the Draft Bay/Delta Water Quality Control Plan and Environmental Report. NCPA is a non-profit California joint action agency and wholesale electric utility established in 1968 under California state law. NCPA's membership consists of fourteen consumer-owned electric utilities. The fourteen members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah, as well as the Plumas-Sierra Rural Electric Cooperative, the Turlock Irrigation District, and the Truckee-Donner Public Utility District. NCPA's members collectively supply electric power to over 600,000 residential and business consumers throughout northern California. A significant share of our wholesale electric this power is produced by the Central Valley Project (CVP) hydroelectric facilities. The Western Area Power Administration (Western) is directed by federal statute to market the CVP power to NCPA members and other non-profit municipal agencies. NCPA provides these comments in our continuing support of environmental restoration efforts in northern California while ensuring that all impacted parties are considered in any proposed state actions.

We applaud your agency for the development of the proposed Water Quality Control Plan (Plan) and supportive documentation. We especially want to commend you and your staff on the thoroughness and candidness of the data and information presented. In the following paragraphs we are proposing some suggestions that we believe would enhance the understanding of the proposed Plan in order to assist state decision and policy makers:

- A. The economics overview of the Environmental Report (Chapter XII(A)) should include a summary of the economic impacts on power users in addition to the impacts on water users. To do otherwise, the overview implies that the power impacts are not significant, while in fact they are as large or larger than the impact on M&I and Agricultural users. This fact should not be excluded from summary discussions.

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- B. Similarly, the presentation of beneficial uses of the waters of the Bay/Delta estuary should be expanded to include hydroelectric power generation. While hydroelectric generation is non-consumptive, water releases through the dams provide environmentally clean and valuable energy to the benefit of the California economy and the various projects. This beneficial use should be reflected in the Plan itself (Chapter II) and the Environmental Report (Chapter II (C)). The inclusion of hydroelectric power generation as a beneficial use is consistent with other elements as defined in the Plan.
- C. We understand that the final economic impact analyses (estimating the impact of the proposed alternative on power users) have recently become completed; they should be incorporated into the document. Please note that the economic impact on power users for the Proposed Alternative exceeds those of Alternatives 1 and 2, as presented in the report. The impact analyses for the proposed action has been completed and is available from the Western Area Power Administration (WAPA) in Sacramento. (Please advise us if you are not able to receive a copy of the analysis directly from WAPA.)
- D. The values in Table XII-6 of the Environmental Report are not consistent with the power impact values we have calculated. A notable difference is in "Restoration Fund Costs." According to our analysis, the impact would be between \$2.8 to \$3.0 million compared to \$400,000 to \$900,000 shown.
- E. One important concern of the water modeling analysis is the exclusion of future changes in the diversion of water from the Trinity River Diversion of the CVP. Current federal studies are underway which expect to significantly reduce the water diverted from the Trinity River to the Central Valley. This reduction (estimates of the reduction range from 200,000 to 800,000 acre feet) will have impact on the ability to maintain both water quantity and temperatures that currently support fish and wildlife habitats in the Central Valley and hence the Bay/Delta. This scenario should be further explored as part of the Bay/Delta assessment to identify potential impacts and mitigation factors. The interaction of Trinity River flows and the Central Valley water quality again demonstrates the continued need to seek integrated fish and wildlife analyses and actions.
- F. We also feel that the SWRCB should be more aggressive in defining methods to manage the various other factors that influence fish and wildlife in the Central Valley. The report defines various other agencies and recommended actions, such as drainage control and harvest management. However, because of the criticality of these impacts on restoration activities and their interrelationship with the factors under the SWRCB's direct authority, these other factors must be emphatically addressed.
- G. We support the need for ongoing evaluation of the impacts of implementing the Plan to identify if further balancing of competing needs is appropriate, as stated on page four of the Plan. Conditions and needs change that might warrant different solutions to enhance the value to the environment and the California economy.

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We appreciate the past opportunity we have had to work with you, your staff, and the Board to present a fair and objective impact assessment on power users. We urge that you include power users, along with Western customers, and fish and wildlife representatives in the discussions regarding implementation of the Plan. We believe that this interaction is important to develop consensus on operational and environmental scenarios within the Delta and upstream of the Delta. Please call Mr. Hari Modi at NCPA (916-781-4204) if you have any further questions and/or comments. Thank You.

Sincerely,

A handwritten signature in cursive script that reads "Hari Modi" followed by a stylized flourish.

ROGER A. FONTES
Assistant General Manager
Governmental Affairs

HM/ddr

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cc: Walt Pettit, Executive Director, SWRCB
NCPA Commission
Western Task Force